

DN FBT CV 15 6048103-S

DONNA L. SOTO, ADMINISTRATRIX	)	SUPERIOR COURT
OF THE ESTATE OF VICTORIA L.	)	
SOTO, DECEASED, ET AL.	)	J.D. OF FAIRFIELD/BRIDGEPORT
	)	@ BRIDGEPORT
v.	)	
	)	
BUSHMASTER FIREARMS	)	
INTERNATIONAL, LLC, ET AL.	)	JUNE 6, 2016

**MOTION FOR PERMISSION TO FILE REPLY**  
**MEMORANDUM OF LAW IN EXCESS OF TEN PAGES**

Defendants, Remington Arms Company, LLC and Remington Outdoor Company, Inc., (the “Remington”), pursuant to Practice Book Sections 4-6(b) and 11-10(b), respectfully move the Court for permission to file a Reply Memorandum to Plaintiffs’ Omnibus Objection to Defendants’ Motions to Strike which totals twenty-five (25) pages in length. Remington’s Reply Memorandum is due to be filed on June 10, 2016. In support of this motion, the Remington Defendants represent as follows:

1. Remington filed a Motion to Strike on April 22, 2016 together with a Memorandum of Law in support thereof. On the same date, the defendants Camfour, Inc. and Camfour Holding, LLP also filed a Motion to Strike as did the Defendant Riverview Sales, Inc. All three motions made virtually identical arguments that the Plaintiffs’ claims were barred by the Protection of Lawful Commerce in Arms Act (“PLCAA”).

2. Plaintiffs moved for permission to file a fifty-five (55) page memorandum in opposition to the three virtually identical motions to strike. Remington did not object to the

Plaintiffs' motion, despite the fact that fifty-five (55) pages seemed more than was needed to respond to the arguments raised in the largely identical motions. Remington did not object to Plaintiffs' request for substantial additional pages because it understood the breadth and importance of the issues raised in its motion. The Court granted the motion, and Plaintiffs filed their memorandum in opposition, totaling fifty-five (55) pages, on May 27, 2016.

3. Due to the length of Plaintiffs' memorandum in opposition and the multiple arguments raised therein (including arguments not raised in opposition to Defendants' Motions to Dismiss), Remington requires fifteen (15) additional pages beyond the ten (10) pages permitted by Practice Book Section 4-6(b) for reply memoranda in order to fully respond to Plaintiffs' arguments opposing the Motion to Strike.

4. If Remington's request is granted, its two memoranda in support of its motion to strike will total sixty (60) pages. The Practice Book contemplates that the moving party will have approximately thirty (30) percent more pages to brief its position in two memoranda than the opposing party has in its one memorandum. Thus, Remington would be justified in requesting at least an additional twenty-five (25) pages – totaling seventy (70) in all – to address the arguments raised in Plaintiffs' fifty-five (55) page memorandum. But Remington has not made such a request, and can adequately reply to Plaintiffs' lengthy memorandum with just fifteen (15) additional pages.

5. Counsel for Remington, James Vogts, communicated with counsel for the Plaintiffs, Alinor Sterling as to whether Plaintiffs object to this request. Counsel for Plaintiffs

will consent to Remington's request only on the condition that Remington agrees to Plaintiffs' filing of a sur-reply. Otherwise, Plaintiffs will consent to only five (5) additional pages.

WHEREFORE, for the foregoing reasons, the Remington Defendants request permission of the Court to file a Reply Memorandum to Plaintiffs' Omnibus Objection to Defendants' Motions to Strike not to exceed twenty-five (25) pages.

THE REMINGTON DEFENDANTS,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was mailed on June 6, 2016 to the following counsel:

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